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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 SNOW COVERED CAPITAL, LLC,
14 Plaintiff,
15 v.
16 WILLIAM WEIDNER, *et al.*,
17 Defendants.
18

Case No.: 2:19-cv-00595-APG-NJK

**STIPULATION AND ORDER TO
EXTEND REMAINING DEADLINES
REGARDING PRE-FORECLOSURE
DAMAGES [ECF 361]**

(THIRD REQUEST)

19 AND ALL RELATED MATTERS.
20

21 Plaintiff Snow Covered Capital, LLC (“SCC”), Defendant William Weidner (“*Mr.*
22 *Weidner*”), and the Estate of Andrew Fonfa (collectively, the “*Parties*”) hereby submit this
23 Stipulation to Extend the Remaining Deadlines Regarding Pre-Foreclosure Damages and request
24 this Court enter an order extending the deadlines originally set forth in the Court’s December 7,
25 2023 Minute Order (ECF No. 361).

26 On December 7, 2023, this court entered an order setting forth, *inter alia*, five deadlines to
27 address the issue of pre-foreclosure damages:

- 1 (1) By December 27, 2023, Defendants are to respond to SCC's pre-foreclosure damage
2 claims in writing;
- 3 (2) By January 3, 2024, the Parties are to meet and confer about the pre-foreclosure
4 damages issues;
- 5 (3) By January 10, 2024, the Parties are to file a stipulation enumerating what agreements
6 have been reached and what remains in dispute;
- 7 (4) By January 17, 2024, the Parties are to file cross-briefs on the issue of pre-foreclosure
8 damages; and
- 9 (5) By January 31, 2024, the Parties are to file responsive briefs on the issue of pre-
10 foreclosure damages.

11 ECF No. 361.

12 On December 22, 2023, the Parties submitted a Stipulation and Order to Extend Remaining
13 Deadlines Regarding Pre-Foreclosure Damages (First Request), requesting this Court extend four
14 of the five remaining pre-foreclosure damages by seven days. ECF No. 369. The Court
15 subsequently granted the seven-day extension request. ECF No. 375. On January 5, 2024, the
16 Parties submitted a Stipulation and Order to Extend Remaining Deadlines Regarding Pre-
17 Foreclosure Damages (Second Request), requesting this Court extend four of the five remaining
18 pre-foreclosure damages by an additional seven days. ECF No. 387. The Court subsequently
19 granted the extension request. ECF No. 392.

20 The Parties are now requesting the additional extensions to these deadlines outlined below.
21 This is the third request for an extension of the deadlines set forth herein.


22 The parties have exchanged information and have met and conferred on certain items of
23 damages but require the additional time for: (1) the parties to review information and materials;
24 (2) for the parties to meet and confer; and (3) for the parties to work on reaching potential
25 stipulations. The parties have shortened the briefing schedule for any potential briefs in order to
26 avoid setting the briefing scheduling too close to the currently scheduled trial dates. The proposed
27 schedule only extends the final response briefs by one day.

Accordingly, the Parties respectfully request that this Court enter an order extending the deadlines related to the pre-foreclosure damages as follows:

Task	Current Deadline	Proposed New Deadline
A stipulation enumerating what agreements have been reached and what remains in dispute is to be filed.	January 24, 2024 by 5:00 PM	January 29, 2024 by 5:00 PM
The Parties are to file cross-briefs on the pre-foreclosure damages issue.	January 31, 2024 by 5:00 PM	February 5, 2024 by 5:00 PM
The Parties are to file responsive briefs on the pre-foreclosure damages issue.	February 7, 2024 by 5:00 PM	February 8, 2024 by 5:00 PM

IT IS SO STIPULATED.

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: January 26, 2024

DATED this 25th day of January 2024.

SNELL & WILMER L.L.P.

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DATED this 25th day of January 2024.

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DATED this 25th day of January 2024.

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